

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,¹

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

BOY SCOUTS OF AMERICA,

Plaintiff,

v.

A.A., *et al.*,

Defendants.

Adv. Pro. No. 20-50527 (LSS)

**Re: Adv. Docket Nos. 54, 72, 77, 107, 116, 151, 162
& 185**

**NOTICE OF SIXTH STIPULATION BY AND AMONG BOY SCOUTS OF AMERICA,
THE OFFICIAL COMMITTEE OF SURVIVORS OF ABUSE, AND THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS MODIFYING THE CONSENT ORDER
GRANTING THE BSA'S MOTION FOR A PRELIMINARY INJUNCTION PURSUANT
TO 11 U.S.C. §§ 105(a) AND 362 AND FURTHER EXTENDING THE TERMINATION
DATE OF THE STANDSTILL PERIOD**

PLEASE TAKE NOTICE that, on March 30, 2020, after notice and a hearing, the Bankruptcy Court entered the *Consent Order Pursuant to 11 U.S.C. §§ 105(a) and 362 Granting the BSA's Motion for a Preliminary Injunction* [Adv. Docket No. 54] (the "Consent Order").

PLEASE TAKE FURTHER NOTICE that the Consent Order stayed, up to and including May 18, 2020 (the "Termination Date"), each of the Pending Abuse Actions and Further Abuse Actions identified on Schedule 1 to the Consent Order with respect to the BSA Related Parties identified on Schedule 2 to the Consent Order, as such schedules are amended from time to time in accordance with the terms of the Consent Order. The time period from the Petition Date to and including the Termination Date, as extended from time to time, is referred to as the "Standstill Period."

¹ The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

PLEASE TAKE FURTHER NOTICE that, on May 18, 2020, the Bankruptcy Court entered the *Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Extending the Termination Date of the Standstill Period Under the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362* [Adv. Docket No. 72], which extended the Termination Date of the Standstill Period up to and including June 8, 2020.

PLEASE TAKE FURTHER NOTICE that, on June 9, 2020, the Bankruptcy Court entered the *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the "Second Stipulation and Agreed Order"), which extended the Termination Date of the Standstill Period up to and including November 16, 2020.

PLEASE TAKE FURTHER NOTICE that, on November 18, 2020, the Bankruptcy Court entered the *Order Approving Third Stipulation by and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 116], which extended the Termination Date of the Standstill Period up to and including March 19, 2021.

PLEASE TAKE FURTHER NOTICE that, on March 17, 2021, the Bankruptcy Court entered the *Order Approving Fourth Stipulation by and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 162], which extended the Termination Date of the Standstill Period up to and including July 19, 2021.

PLEASE TAKE FURTHER NOTICE that, on July 21, 2021, the Bankruptcy Court entered the *Order Approving Fifth Stipulation by and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 185], which extended the Termination Date of the Standstill Period up to and including the earlier of (a) October 28, 2021, or (b) the date of the first omnibus hearing after the Bankruptcy Court issues its decision confirming or denying confirmation of the Plan.

PLEASE TAKE FURTHER NOTICE that, on October 3, 2021, the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors (collectively, the "Parties") entered into that certain *Sixth Stipulation By and Among Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Further Extending the Termination Date*

of the Standstill Period (the “Sixth Stipulation”).² The Sixth Stipulation, in accordance with its terms and subject to Bankruptcy Court approval, extends the Termination Date of the Standstill Period up to and including the date of the first omnibus hearing after the Bankruptcy Court issues its decision confirming or denying confirmation of the Plan.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Consent Order, as modified by the Second Stipulation and Agreed Order, objections, if any, to the Sixth Stipulation must be: (a) in writing and served on or before **October 18, 2021, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”); (b) filed with the Clerk of the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801; and (c) served so as to be received on or before the Objection Deadline by counsel to the BSA, the TCC, and the UCC, and counsel to any affected BSA Related Party or Additional BSA Related Party or their counsel of record.

PLEASE TAKE FURTHER NOTICE that reply papers, if any, must be filed by **October 25, 2021, at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that a telephonic hearing on the Sixth Stipulation will be held on **November 10, 2021, at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Laurie Selber Silverstein of the United States Bankruptcy Court for the District of Delaware (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that, at the Hearing, the Parties intend to seek entry of the order, substantially in the form attached hereto as **Exhibit A**, approving the terms and conditions of the Sixth Stipulation attached thereto as **Exhibit 1**.

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Sixth Stipulation. In the instance of any conflict between this notice and the terms or conditions of the Sixth Stipulation, the Sixth Stipulation shall control.

Dated: October 3, 2021
Wilmington, Delaware

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**ATTORNEYS FOR THE DEBTORS AND
DEBTORS IN POSSESSION**